UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Gigi JORDAN,

Plaintiff,

Case No. 12 Civ. 1742 (KBF) (RLE)

-against-

Raymond A. MIRRA, JR.,

Defendant.

NOTICE OF MOTION BY THE NEW YORK COUNTY DISTRICT ATTORNEY FOR LEAVE TO INTERVENE PURSUANT TO FRCP 24(A) AND (B) AND FOR A STAY OF DISCOVERY

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law dated April 23, 2012, and the exhibits thereto, the New York County District Attorney ("District Attorney") will move this Court, before the Honorable Katherine B. Forrest, at Courtroom 15A of the United States Courthouse for the Southern District of New York located at 500 Pearl Street, New York, New York, at a date and time to be scheduled by the Court, to intervene in the above-captioned action pursuant to Federal Rules of Civil Procedure 24(a) and/or 24(b), for the sole purpose of moving to stay discovery in the above-captioned action pending the resolution of an overlapping criminal matter against the Plaintiff herein (Gigi Jordan), presently pending before the New York State Supreme Court, Criminal Term.

Dated: New York, New York April 23, 2012

> S/Kerry J. O'Connell [KO0152] Kerry J. O'Connell Assistant District Attorney Of Counsel

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